

# STATE OF ALASKA

TONY KNOWLES, GOVERNOR

## DEPARTMENT OF FISH AND GAME

### OFFICE OF THE COMMISSIONER

P.O. BOX 25526  
JUNEAU, AK 99802-5526  
PHONE: (907) 465-4100  
FAX: (907) 465-2332

January 12, 2001

Bud Graham, Assistant Deputy Minister  
Ministry of Agriculture, Food and Fisheries  
P.O. Box 9359 Station Prov. Government  
Victoria, BC V8W 9M2  
CANADA

Dear Mr. Graham:

I would like to thank you for the time and effort you and your department made to arrange the tour and discussion of the Atlantic salmon farms in British Columbia. My staff and I appreciated your efforts.

We appreciate the Province's attitude toward reducing escapes; however, we remain very concerned with the fact that the goal is one of managed risk and not zero escapes. Although there are some escapes that occur slowly, many of them occur because of catastrophic events and have resulted in large numbers of escaping fish. We believe that these events will continue to occur, although perhaps less frequently or at lower levels, as the prevention measures you outlined are implemented. We heard several times it is not in the fish farming industry's best interest to have escapes. We agree. However, we note that the burdens of industry and government are essentially different. While industry is primarily interested in responsible and profitable operations, governments are responsible for protecting the environment and the economies they support. In our view preventing all escapes of an introduced species in the interest of environmental protection, must be a primary and critical responsibility of the industry.

We are concerned at the gradual lowering of expectations regarding the capability of escaped Atlantic salmon to survive and compete with wild Pacific salmon. At first it was stated that few Atlantic salmon would escape and those that did would quickly perish. Now, Atlantic salmon have been caught as far north as the Bering Sea, and recoveries are becoming common in both saltwater and freshwater Alaska fisheries. It was also presumed that Atlantic salmon could not successfully reproduce in the wild. Now, naturally spawned juvenile Atlantic salmon have been found on Vancouver Island. We believe this demonstrates that establishment of such a feral population is possible and may already have occurred.

Many things have changed since deliberate attempts to introduce Atlantic salmon were made. Habitat that gave rise to great populations of Pacific salmon in British Columbia is no longer intact. The number of Pacific salmon utilizing this habitat is at a low since humans first began to track these populations. Ocean characteristics have also changed. We believe that all of these


factors may make it more likely Atlantic salmon will establish reproducing populations. You and industry representatives pointed out that the number of escapes as a percentage of overall production has been decreasing. We simply point out that even if this is the case, the actual number of real escapees can still be increasing. We note the harvests of Atlantic salmon in Alaska and presumably the successful reproduction on Vancouver Island were apparently the result of these low levels of escapes.

We are also concerned about the establishment of Atlantic salmon farms in the northern portion of the province, closer to the Alaska and British Columbia border. Regardless of the improvements in technology and procedures, we believe that catastrophic events resulting in escapes are inevitable due to the difficulty of adapting farms to a new and different environment. This will certainly result in more Atlantic salmon being present in Alaskan waters.

We encourage you and other producers of Atlantic salmon on the West Coast to adopt policies that allow no escapement. If this means expensive land-based containment systems, so be it. We also encourage you to explore the possibilities of using sterile or mono-sex salmon to reduce the risk of establishment of feral populations. We would also encourage you to use local, indigenous Pacific salmon stocks for farming.

I hope you have found these comments constructive, which is my intention. Again, thank you for the tour and frank discussion.

Sincerely,

  
Frank Rue  
Commissioner

cc: Doug Mecum